

# Exhibit 12

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**STEVEN R. FINNEY**  
**District Attorney General**  
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November 13, 2023

**VIA OVERNIGHT**

Mrs. Vanessa Baehr-Jones  
Founding Partner  
Advocates for Survivors of Abuse  
4200 Park Boulevard, Number 413  
Oakland, California 94602

Dear Mrs. Baehr-Jones

I am writing to you to discuss certain issues related to the ongoing investigation of Sean Williams. As you are aware, my investigator has been involved in this case since June of this year with the assistance of the Tennessee Bureau of Investigation. While this is somewhat unconventional, I felt that it was necessary in order to avoid any potential conflict which may result due to pending civil litigation involving the Johnson City Police Department.

While it is the policy of my office to neither discuss nor disclose any specific details related to ongoing criminal investigations, I will share with you that my office and the Tennessee Bureau of Investigation have worked diligently over the past several months in building a multi-faceted criminal case against Mr. Williams. As a result of these efforts, Mr. Williams was indicted by a Washington County Grand Jury on September 11<sup>th</sup> of this year for crimes committed against child victims. In at least one of these cases, Williams is facing a mandatory sentence of life without the possibility of parole.

The investigations involving sexual based offenses against adult female victims are ongoing and it is my commitment to continue efforts in these cases. From the beginning, I have committed to pursuing these investigations in a manner which protects the well-being and dignity of the victims and to maintain a victim-centered approach. My office and the Tennessee Bureau of Investigation have made every effort to ensure that the victims are treated in a compassionate and empathetic manner and that resources such as victim advocates and therapy are readily available. These resources are provided at no financial cost to the victims.

In speaking with the investigators involved in this collaborative effort, it is my understanding that they have attempted to speak with the victims whom you represent in the federal civil class action lawsuit, filed June 21, 2023. However, these efforts have been impeded by you. While I am aware that you have been granted pro hac vice privilege for the purpose of representing a certain number of victims in the civil class action lawsuit filed in Federal Court for the Eastern District of Tennessee, I would point out that this privilege does not extend beyond that limited purpose. Rule 19 of the Tennessee Supreme Court sets forth the requirements necessary for you to appear pro hac vice in the State of Tennessee. As of this writing, it does not appear that you have the proper privileges necessary to provide legal representation of clients in the State of Tennessee. Therefore, any further involvement between you and any victim in the Sean Williams case with respect to legal advice or representation relating to the ongoing state criminal prosecution could be improper.

In order to proceed with the cases against Mr. Williams, it is imperative that these victims speak with state investigators. Additionally, for the victims who have already spoken with state investigators but are now being represented by you in the class action suit, the state investigators will need an open line of communication with them as well. It is unclear at this point as to whether any of these represented victims wish to participate in the state prosecution of Williams or continue cooperation with the investigation. I have conferred with the Tennessee Board of Professional Responsibility in this matter and pursuant to Tenn. R. Sup. Ct 4.2 Comment 5, will be proceeding.

Furthermore, my office is beginning to receive claims for compensation from the State of Tennessee's Criminal Injuries Compensation Program that have been filed by victims who are represented by you in the civil class action suit. Tennessee Code Annotated § 29-13-109(b)(2)(H) requires that any victim seeking compensation from this fund must fully cooperate with law enforcement and prosecution efforts. As part of this process, it is required that I sign an affidavit that all legal requirements have been met. Without speaking with these victims, we are unable to provide the necessary documentation for them to complete the application process. Once arrangements are made to meet with them, the process can proceed. Victim Witness Coordinators with my office as well as with the Tennessee Bureau of Investigation are willing to assist with this process.

I have instructed my investigator and assisting Special Agents with the Tennessee Bureau of Investigation to contact the victims who are being represented by you in the civil class action suit so that they can arrange to meet with the investigators, if they wish, to discuss their desire to pursue criminal prosecution against Mr. Williams in state court.

Sincerely,



Steven R. Finney  
District Attorney General